

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
ELLEN P. GILLERAN	:	
FRANK X. GILLERAN	:	
Debtors,	:	
	:	
v.	:	
	:	Bankruptcy No. 1:16-bk-03627-HWV
NEWREZ LLC d/b/a SHELLPOINT	:	
MORTGAGE SERVICING	:	
Movant,	:	
	:	
ELLEN P. GILLERAN	:	
FRANK X. GILLERAN	:	
Respondents,	:	
	:	
CHARLES J. DEHART III	:	
Trustee	:	

**DEBTORS' ANSWER TO MOVANT'S MOTION FOR RELIEF FROM THE
AUTOMATIC STAY AND REQUEST FOR SPECIAL RELIEF**

AND NOW COMES, Debtors, Ellen P. Gilleran and Frank X. Gilleran, by and through their attorneys, Jacobson, Julius & Harshberger, and hereby file this Answer to Movant's Motion for Relief from the Automatic Stay and in support thereof states as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. (sic).

7. It is admitted the Debtors are behind on payments to Movant. Debtors have been in direct communications with Movant and they understand that Movant is willing to move the post-petition payments to the end of the loan via a modification. Debtors are hopeful that Movant will

allow the same. Otherwise, Debtors hope that Movant will allow them to cure the arrears via an amended plan.

8. It is admitted the Debtors are behind on payments to Movant. Debtors hope that Movant will allow them to cure the arrears via an amended plan.

9. Paragraph 9 is a conclusion of law to which no response is required. To the extent a response is required, said averment is denied.

10. Paragraph 10 is a conclusion of law to which no response is required. To the extent a response is required, said averment is denied.

WHEREFORE, Debtors respectfully request that this Honorable Court deny Movant's Motion for Relief from the Automatic Stay and further requests any other relief deemed necessary and just.

Respectfully Submitted,

JACOBSON, JULIUS, & HARSHBERGER

Dated: November 12, 2020

/s/Chad J. Julius
ID# 209496
8150 Derry Street
Harrisburg, PA 17111.5260
717.909.5858

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	:	
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CERTIFICATE OF SERVICE

I, Dera Shade, of Jacobson, Julius & Harshberger, do hereby certify that on this day I served the within **Respondent's Answer to Movant's Motion For Relief From The Automatic Stay** upon the following persons via the ECF/CM system and/or by depositing a true and correct copy of the same in the United States Mail, first class, postage prepaid:

ECF/CM:

Charles J. Dehart III, Esquire (Trustee) 8125 Adams Drive, Suite A Hummelstown, PA 17036	Rebecca A. Solarz, Esquire KML Law Group, P.C. 701 Market Street, Suite 5000 Philadelphia, PA 19106-1532
United States Bankruptcy Court Ronald Reagan Federal Building 228 Walnut Street, Room 320 Harrisburg, PA 17108	

/s/ Dera Shade
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Dated: November 12, 2020